

FINAL MEETING SUMMARY

**HANFORD ADVISORY BOARD
RIVER AND PLATEAU COMMITTEE**

June 14, 2016

Richland, WA

Topics in this Meeting Summary

Opening.....	1
Hanford Site Tour	2
Status of SWOC/Rev. 9 and 8C. Permit Modifications	2
Update on Central Plateau Milestone Change Packages.....	5
Review of FY17 HAB Work Plan	9
Committee Business.....	11
Attachments	12
Attendees	13

<i>This is only a summary of issues and actions discussed at this meeting. It may not represent the fullness of represented ideas or opinions, and it should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.</i>
--

Opening

Pam Larsen, River and Plateau Committee (RAP) chair, welcomed the committee and introductions were made. Committee members adopted the April 2016 RAP meeting summary.

Hanford Site Tour

Hanford Advisory Board (HAB or Board) members received a Site tour, led by agency staff members from the U.S. Department of Energy – Richland Operations Office (DOE-RL) and the Environmental Protection Agency (EPA). The tour informed existing and incoming Board members on the cleanup and work status at several locations on the Hanford Site, including:

- 300-Area uranium sequestration¹
- 618-10 Burial Ground
- Environmental Restoration and Disposal Facility (ERDF)
- Plutonium Finishing Plant (PFP)
- 200-West-Pump-and-Treat

Status of SWOC/Rev. 9 and Rev. 8C Permit Modifications

Pam Larsen introduced an update on the status of the Rev. 9 and Rev. 8C permit modifications for the Solid Waste Operations Complex. The RAP committee was previously briefed on the status of the permit modification process in February 2016.

Agency Presentation

Stuart Luttrell, Washington State Department of Ecology (Ecology), informed the RAP committee of revisions to the Rev. 8C permit. Key points from Stuart's presentation include:

- Ecology submitted the application for the Rev. 8C permit modification to DOE on January 28, 2016, followed by a 60-day public comment period.
- Due to the size of the application, the public comment period received an extension of 30 days. The public comment period closed on May 13, 2016.
- Ecology reviewed the permit application and provided a determination of completeness on May 12, 2016. Ecology determined that the application was incomplete and is continuing to proceed with a technical review of the application.
- Ecology will review each addendum to the permit for each operating unit group including the Low-Level Burial Ground Trenches, T-Plant Complex, and the Central Waste Complex – Waste Receiving and Processing Facility.

Attachment 1: 300-FF-05 handout

- Ecology will review each addendum section and provide written comments to DOE-RL and CH2M Hill Plateau Remediation Company (CHPRC). DOE-RL and CHPRC will provide responses to Ecology's written comments.
- After each agency has had the opportunity to provide written comments, the parties will hold meetings to update the Rev. 8C permit application in real-time. In the event that there are unresolvable issues by either party, the issue will elevate for resolution by the Tier-1 Committee. In the event that the Tier-1 Committee provides a resolution that is not accepted, the issue will be elevated to the Tier-2 Committee.
- DOE-RL and CHPRC will submit a revised package after the addendums are completed and finalized.
- Ecology prepares the draft permit, after the agency has received the completed addendums and has certified submission from DOE-RL. The permit modification involves conditions for each operating unit group, including fact sheets, applicable addenda, a public notice, and a focus sheet.
- The permit modification will have a public comment period of 45-days. If there is a sufficient amount of interest, a public hearing may occur.
- Ecology will issue a permit that includes a notice of the final decision. The decision becomes effective 30-days after the service of the notice. Simultaneously, Ecology will release a document that contains all of the agency responses to the public comments received during the 45-day public comment period. Ecology issues and finalizes the permit after the public comment period ends.

Stuart stated that there are no real barriers to the revision process of the Rev. 8C permit application. The challenge is due to the size and complexity of the permit. Each operating unit group will require permits before it is stored or treated for dangerous waste. Stuart noted that agencies would not develop a permitting roadmap to explain the steps in the revision process. He offered to show the regulations and processes to any individual who is interested to learn more.

Stuart mentioned that Deborah Singleton, project manager at Ecology, has accepted a position with CHPRC. Deborah will be working on projects related to the K-Basin sludge remediation, 324 Building, and the 618-11 Burial Ground.

Michael Collins, DOE-RL, informed the RAP committee of the process for modifying the Rev. 9 permit. Key points from Michael's presentation include:

- One reason to form the Tier-1 and Tier-2 Committees was to help provide resolutions to issues that affected the modification of the Rev. 9 permit.
- There are twenty-five solid waste burial grounds located on the Central Plateau. Michael noted that eight of the solid waste burial grounds are included in Part A of the approved permit.
- In November, DOE-RL requested approval from Ecology to remove Reactor Trench 94, that contained PCBs and lead. The trench appeared to have met the toxic disposal requirements. He

noted that this removal effort might affect the scope of the SWOC permit applications, but that it is limited only to this trench.

Modifications will be applied to the Rev. 8C permit before the Rev. 9 permit, in an effort to minimize duplicative work. Agencies are working in parallel to revise the permits for other dangerous waste management facilities.

Committee Questions and Responses²

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

Q. When will the meetings to edit the permit application take place between Ecology and DOE-RL and CHPRC?

R. [Ecology] A meeting with all of the involved parties is scheduled on June 15, 2016 to discuss the overall plan and sequence for review. There are factors that may affect the schedule, but the agencies are hoping to have the process completed by late 2017.

Q. Are there major or minor differences of opinion to be resolved between Ecology and DOE-RL?

R. [Ecology] There are some major differences to be resolved.

Q. Will there be a delay in moving waste from K-Basins to the T-Plant Complex if the permit modification is not ready until late 2017?

R. [DOE-RL] Currently, the T-Plant Complex is being prepped to receive waste, including cleaning out cells and designing storage racks. The permit modification process does not affect the preparation for the T-Plant Complex to receive waste. The transfer of waste is expected to occur in 2018.

Q. How will the permit modification interfere with the transfer of sludge from the K-Basins to the T-Plant Complex if sludge is not listed under the Resource Conservation and Recovery Act permit?

R. [Ecology] There are a number of cells located under the shielding deck within the T-Plant Complex. Sludge is placed into the K-Basin containers and stored in the racks, within the cells. The agencies have been discussing whether those cells should be included in the Rev. 8C permit. Sludge waste does not have dangerous characteristics.

Q. Who are the people who make up the Tier-1 and Tier-2 committees?

R. [Ecology] The objective of having the committees is to help resolve issues that the permit writer and contractor may run into. The Tier-1 and Tier-2 Committees are comprised of managers from various agencies – Suzanne Dahl (Ecology), Lisa McArthur (EPA), Rod Hastings (DOE-ORP), and Jeff Frey or his deputy (DOE-RL). The Tier-2 Committee consists of Alex Smith

(Ecology), Jan Hastings (EPA), Doug Shoop (DOE-RL), and JD Dowell (DOE-ORP). No issues have moved to the Tier-2 Committee yet.

C. One benefit is that agencies will not risk legal challenges when Ecology releases the permit.

R. [Ecology] Ecology is anticipating to receive public comments, but the agency is attempting to resolve issues that may arise with the permittee before the public comment period begins.

C. Due to the size and complexity of the permit application, it would be helpful to break them into smaller permits by operating unit groups. Another suggestion would be to extend the public comment period for 60-days for the entire permit application. 45 days is not enough time.

R. [Ecology] This is helpful information, thank you.

C. In order to ensure that their input is considered, the Yakima Nation would like to meet with the Tri-Party Agencies (TPA) to discuss permit modifications and associated issues.

Q. When will the other operating unit groups close?

R. [Ecology] Ecology is working on the T-Plant Complex closure plans. There are fourteen units in which Ecology is trying to catch up with the closure plans. Currently, Ecology is working on identifying issues and releasing a schedule for closure. Ecology anticipates closing a few units every few months.

The RAP committee thanked Stuart, Ron, and Michael for their presentations and agency perspectives. In November 2016, the RAP committee will ask the agencies if there is a status update that can be provided on the SWOC Rev. 9 and Rev. 8C permit modifications.

Update on Central Plateau Milestone Series Change Packages

Dale Engstrom introduced the background on the Central Plateau Milestone Series Change Packages. Dale stated that the Board submitted advice to the TPA regarding the change of several cleanup milestones. The RAP committee received responses from the TPA for the individual advice points.

Agency Presentation

Ben Vannah, DOE-RL, provided updates on the Central Plateau Milestone Series Change Packages based on the advice received from public comments, including the HAB. Key points from Ben's presentation include:

- The status of the Central Plateau Milestone Series Change Packages is final as of May 25, 2016. There are thirty-six milestones total. Ben noted that there are twenty new milestones, thirteen milestones were extended, three milestones were revised, and zero milestones were deleted.
- The public comment period on the Central Plateau Milestone Series Change Packages ran from October 26, 2015 to December 11, 2015. Upon multiple requests, the public comment period was

extended to February 12, 2016. Public meetings were held in Richland, Washington; Seattle, Washington; Hood River, Oregon; and Portland, Oregon.

- Ben noted that a general comment from the public was that there was not enough time between the announcement of the public meetings and when the meetings were held. He also noted that the agency received many comments about the limited time frame there was to review and provide feedback on the Milestone Series Change Packages. Based on this feedback, DOE-RL extended the public comment period twice, to a 109-day comment period.
- DOE-RL received over 1,500 comments on the Central Plateau Milestone Series Change Packages. 1,400 of the comments were in the format of a form letter.
- Ben noted that the public comments helped DOE-RL prioritize the cleanup work on the Hanford Site and to set clear project milestone cleanup dates.

Ben led the RAP committee through the TPA's response to advice points 1-9. The TPA response was in agreement with multiple HAB advice points.³ Notable changes to milestones within the Central Plateau Milestone Series Change Packages are listed below:

- Advice points 1-3
 - Ben said that due to funding and budget planning processes, the TPA agencies were not able to secure the necessary funding to expedite certain milestones. The TPA agencies ask Congress for the required cleanup amount every year.
- Advice point 4
 - Ben stated that DOE-RL originally set a "To Be Determined (TBD)" date for milestone M-016-00. After receiving substantial public feedback about not labeling milestones "TBD", the new milestone date for M-016-00 is Sept. 30, 2042.
- Advice point 5
 - Based on the public feedback received, DOE-RL prioritized the M-015-00 and M-016-00 milestone series to reflect the priority status of demolishing U Canyon and the closure of B Pond and S Pond. The TPA agencies received over 500 comments to investigate the underlying trenches. Based on the interest level, a new milestone (M-015-93C) was created to investigate the solid waste landfills and trenches for potential leaching.
- Advice point 6
 - Ben stated that the TPA agencies received numerous comments to accelerate the demolition of the 324 Building. DOE-RL was unable to accelerate the demolition of the 324 Building, however, a new milestone (M-16-85A) was created to initiate remediation

Attachment 3: TPA-287; Central Plateau Milestone Series Change Package (Response to Advice #287)

of the 300-296 waste site. DOE will complete remote excavations of the high-radiation portion of the waste site by 2019.

- Advice point 7
 - Ben noted that the TPA agencies will keep the HAB informed as the agencies' work toward the cleanup of the 618-11 Burial Ground, under milestone M-016-086.
- Advice point 8
 - The TPA agencies agreed with the HAB and established a new milestone (M-085-80A) to submit a data quality objectives report and assess the structural integrity of the Plutonium Uranium Extraction Plant (PUREX) storage tunnels by Sept. 30, 2017.
- Advice point 9
 - Based on public comments and the advice from the Board, a new milestone date was requested to move the cesium and strontium capsules from the Waste Encapsulation Storage Facility to dry storage. Ben noted that the TPA agencies did not change the timeline for milestone M-92-05, stating that the current milestone date of Jun. 30, 2017 reflects the level of priority.

Committee Questions and Responses²

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

Q. What is the new milestone under advice point 5? Why was the Nonradioactive Dangerous Waste Landfill (NRDWL) removed from the package? What changes are occurring to U Canyon and the B and S Ponds?

R. [DOE-RL] The milestone under advice point 5 is M-015-93C. NRDWL was removed from the Central Plateau Milestone Series Change Package at the request of the EPA and Ecology. U Canyon demolition is delayed by three years, from 2024 to 2027. The B Pond and S Pond closures are also delayed by three years, under milestone M-037-011. DOE-RL can get back to the RAP committee on the new date for B Pond and S Pond milestones.

C. It is interpreted that the TPA Agencies did not agree with the HAB on advice point 7.

R. [DOE-RL] The advice point states that the Board supported the newly proposed milestone for cleanup of the 618-11 Burial Ground (M-016-086). The TPA agencies appreciated the support the Board and kept the milestone date as is, Sept. 30, 2021.

C. It is encouraging to hear that the TPA agencies agreed with the HAB's advice and attempted to achieve the Board's request within the agencies' parameters. It is encouraging to see the response to advice point 6. Cleanup of the 324 Building is a high priority for those that live downstream on the Columbia River.

R. [DOE-RL] There was a consistent message from the public about the priority to clean up the 324 Building. All the comments received helped the agencies gauge cleanup priorities. DOE-RL revamped presentations for future public meetings and would like to thank the HAB for assisting the agencies in communicating information to the public.

Ben continued to review the TPA agency responses to advice points 10-13. Key takeaways from these advice points include:

- Advice point 10
 - The TPA agencies organized presentations with tribes and other interest groups to inform individuals of upcoming cleanup work on the Hanford Site. Per the TPA requirements, agencies have budget meetings to explain what work will continue and what work might be delayed.
- Advice point 11
 - The TPA agencies have updated public presentations based on feedback received from the Board. The TPA agencies look forward to future comments about modifying information materials as needed.
- Advice point 12
 - Ben stated that the TPA agencies received comments on improving the clarity and thoroughness of terminology and explanations used in informational materials. The TPA agencies agreed with the Board's advice point and released a term addendum sheet halfway through the public comment period to provide greater clarity on terms and definitions.
- Advice point 13
 - Ben noted that the TPA agencies will attempt to address the various topics that were advised for utility and clarity during the public comment periods of future change packages.

Agency Perspective

Emy Laija, EPA, recognized Ben for his work during the process of providing responses to Board advice #287. Emmy noted that Ben did excellent work in keeping track of public comments and keeping the project moving forward.

Committee Questions and Responses²

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

Q. Can more clarity be provided on the response to advice point 10?

R. [EPA] Agencies heard this request stated several times during the public comment period. There is a TPA public involvement calendar, but it can be difficult to schedule events far in advance due to the lack of knowledge of events and funding. The response to advice point 10 was meant to inform the difficulty agencies can have when scheduling public involvement activities far in advance.

C. The State of the Hanford Site Meetings were valuable meetings. A meeting of that nature would be appreciated by the Board where agencies could update the HAB on the status of various activities on the Hanford Site.

R. [EPA] It would be a large challenge for the agencies to hold meetings of that magnitude a couple of times a year, on an annual basis. The agencies are proceeding with the State of the Hanford Site Meetings for FY 2017.

C. It is not clearly explained in the advice responses how the TPA agencies will mitigate the loss of unfunded work. The explanation should be delivered clearly to the public through informational materials.

C. The agencies could create a lifecycle cost report that explains how cleanup activities will cost more money the longer the work is delayed. The report could be coupled with an evaluation about the advantage in performing the cleanup work now versus later.

R. [EPA] It is difficult for DOE-RL to develop a contingency plan on not meeting the milestones they just signed up to complete.

The RAP committee thanked Ben and Emy for their presentation on the TPA agencies' response to HAB advice #287.

Review of FY17 HAB Work Plan

Pam Larsen stated that she presented the proposed work plan topics at the May Leadership Workshop, based on what was discussed at the RAP committee meeting in April. These topics were presented to the HAB at the Board meeting in June.

Ryan Orth, meeting facilitator, stated that the planned adoption of the HAB FY 2017 work plan will occur at the Board meeting in September.

Attachment 2: Transcribed Flipchart Notes

Committee Questions and Responses²

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

Q. Should an update be provided to the RAP committee about the remediation at K-Basins?

R. [EPA] The discussion regarding the K-Basin milestones occurred in the Change Package last FY.

Q. How will the remediation of the K-Basins be coordinated with the permit modifications at the T-Plant Complex? It would be informative to receive a better understanding of the K-Basin sludge retrieval process.

R. [EPA] The explanation of significant difference did not specify that level of detail about the K-Basin sludge retrieval process. The earliest milestone for K-Basin sludge retrieval is 2017.

R. [DOE-RL] DOE-RL can work to find the appropriate contact and explain the sludge retrieval process in greater detail.

C. There are only four Board meetings during FY 2017. There is a great deal of work to do each quarter, but a lot of the work can be done during RAP committee meetings.

C. The topic of ‘end states’ for the Central Plateau may be discussed at a future RAP committee meeting.

The RAP committee will request to receive a project update on sludge retrieval during the first quarter of FY 2017. Changes to the FY 2017 work plan topics will be addressed at the Board meeting in September, in preparation for the finalization of the HAB work plan topics in FY 2017.

Committee Business

RAP 3-Month Work Plan²⁴

The RAP committee is tentatively planning to hold a phone call on July 13, 2016 to discuss the agenda topics for the Board meeting in August 2016. The time of the call is to be determined.

The RAP committee will plan to hold a committee meeting in August 2016 that will tentatively include the following topics:

- Update on 100 D/H
- Update on groundwater 300-FF-5 uranium treatability test results
- Receive an agency presentation by EPA regarding an update on 200-PW 1/3/6

Attachment 2: Transcribed Flipchart Notes

Attachment 4: RAP 3-Month Work Plan

Attachments

Attachment 1: 300-FF-005 handout

Attachment 2: Transcribed Flipchart Notes

Attachment 3: TPA-287; Central Plateau Milestone Series Change Package (Response to Advice #287)

Attachment 4: RAP 3-Month Work Plan

Attendees

Board members and alternates:

Jan Catrell	Alex Klementiev	Jean Vanni
Dale Engstrom	Pam Larsen	Helen Wheatley
Steve Hudson (phone)	Gene Van Liew	

Others:

Michael Collins, DOE-RL	Stuart Luttrell, Ecology	Noah Cruz, CHPRC
Kristen Holmes, DOE-RL	Ron Skinnarland, Ecology	Samantha Herman, EnviroIssues
Kyle Rankin, DOE-RL	John Temple, Ecology	Ryan Orth, EnviroIssues
Ben Vannah, DOE-RL	Ginger Wireman, Ecology	Marra Clay, EPA
	Emy Laija, EPA	Shintaro Ito, EPA
	Tom Rogers, Washington Department of Health	David Bolingbroke, Hanford History Project
		Alyssa Dyck, MSA